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DATE FILED: <u>MAY 23 2007</u>

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GANG KOU, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

v.

MEDIS TECHNOLOGIES LTD., ROBERT K.
LIFTON, and ANDREW UDIS,

Defendants.

07 CV 3230 (PAC)

STIPULATION + Order

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that Defendants Media Technologies Ltd., Robert K. Lifton, and Andrew Udis, having acknowledged receipt of the Complaint, dated April 23, 2007, and having waived their right to require Plaintiff to effect formal service of process on them, need not and shall not respond to the Complaint. Instead, the parties shall adhere to the following schedule with respect to an Amended Complaint:

1. Plaintiff shall have sixty (60) days from the time an order is entered appointing lead plaintiff and lead counsel to amend the Complaint (the "Amended Complaint");
 2. Defendants shall have sixty (60) days to respond to Plaintiff's Amended Complaint;
 3. If Defendants respond with a Motion to Dismiss, Plaintiff shall have forty-five (45) days to oppose the Motion to Dismiss (the "Opposition"); and
 4. Defendants shall have thirty (30) days to reply to Plaintiff's Opposition.
5. But no such motion to dismiss may be made without seeking a pre motion conference. See the court's Standard Practice.

Dated: New York, New York
May 21, 2007

THE ROSEN LAW FIRM, P.A.

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Andrew Udis

SO ORDERED: MAY 23 2007

Paul A. Crotty
Hon. Paul A. Crotty
U.S.D.J.

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